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BY D. MARK JONES, CLERK
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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SANDY FLORES-VELAZQUE, and
JACQUELYNN BOWMAN,

Defendants.

Case No. **2:16mj359-DBP**

COMPLAINT

Possession of Methamphetamine with
Intent to Distribute

Magistrate Judge Dustin B. Pead

Before Dustin B. Pead, United States Magistrate Judge for the District of Utah,
appears the undersigned, who on oath deposes and says:

COUNT 1

On or about February 10, 2016, in the Central Division of the District of Utah,

SANDY FLORES-VELAZQUE, and
JACQUELYNN BOWMAN

the named defendants herein, did knowingly and intentionally possess with intent to
distribute fifty (50) grams or more of a mixture or substance containing a detectable
amount of methamphetamine, a Schedule II controlled substance, within the meaning of 21

U.S.C. § 812; all in violation of 21 U.S.C. §841(a)(1), and punishable pursuant to 21 U.S.C. §841(b)(1)(B).

COUNT 2

[21 U.S.C. § 841(a)(1) and § 846]

On a date unknown, but at least by November, 2015, and continuing through June 23, 2016, in the Northern Division of the District of Utah and elsewhere,

SANDY FLORES-VELAZQUE, and
JACQUELYNN BOWMAN

the defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown to distribute one fifty (50) grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C § 841(a)(1) and 21 U.S.C. § 846, and punishable pursuant to 21 U.S.C. § 841(b)(1)(B).

Complainant states that this complaint is based on information obtained through an investigation consisting of the following:

1. Complainant is a Special Agent with the Drug Enforcement Administration (DEA), where he is assigned as a narcotics investigator. Complainant is familiar with the facts and circumstances alleged in this complaint.
2. On February 10, 2016, a Davis Metro Narcotics Strike Force cooperating source negotiated the purchase of eight ounces of methamphetamine from SANDY FLORES-VELAZQUE.

3. Later that day, the cooperating source met with SANDY FLORES-VELASQUE and JACQUELYNN BOWMAN, who were working together, and made the transaction. The purchase price of the methamphetamine was \$2,400, and the transaction was recorded.
4. Between the dates of approximately November 2015 and June 23, 2016, SANDY FLORES-VELAZQUE, and JACQUELYNN BOWMAN were involved in the distribution of methamphetamine in the Davis County, Utah area. This was corroborated through intelligence sources, surveillance, and a title III investigation on telephones utilized by SANDY FLORES-VELASQUE.
5. The methamphetamine distribution activities were further corroborated through the use of a cooperating source that made eight controlled purchases of narcotics from SANDY FLORES-VELASQUE, and /or JACQUELYNN BOWMAN.
6. On June 6, 2016, a gold Tahoe was observed departing from the parking lot of SANDY FLORES-VELAZQUE's apartment. Based on information intercepted from wire communication, it was believed that the vehicle was transporting a load of cash back to suppliers. A traffic stop by the Utah Highway Patrol led to the discovery of approximately \$ 65,884 which was inside the vehicle. In an interview with the driver of the vehicle, he stated that he received the money from Sandy FLORES.

7. On June 23, 2016, federal search warrants were executed on a storage unit rented by SANDY FLORES-VELASQUE. Inside the unit, Agents seized approximately 4.5 ounces of a substance which field tested positive for heroin.
8. On that same date, another federal search warrant was executed at the home of Sandy FLORES Sr. (SANDY FLORES-VELASQUE's mother). The result of that warrant was the seizure of approximately \$10,000 US currency.

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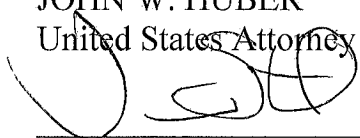
9. On June 24, 2016, DEA Deputized Agents executed a federal search warrant at a storage unit rented by SANDY FLOREZ-VELASQUE. The result of the search was the seizure of approximately ten pounds of marijuana, and a stolen Colt .380 handgun.



MATT FAIRBANKS
Special Agent,
Drug Enforcement Administration

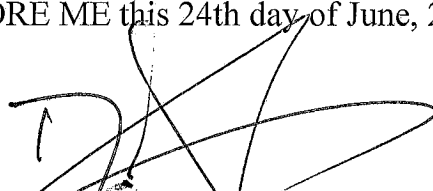
APPROVED:

JOHN W. HUBER
United States Attorney



VERNON G. STEJSKAL
Assistant United States Attorney

SUBSCRIBED AND SWORN TO BEFORE ME this 24th day of June, 2016.



DUSTIN B. PEAD
United States Magistrate Judge